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December 21, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: **WT Docket No. 11-49**

These comments reflect the concerns of NetsurfUSA, Inc. Our company is primarily a wireless broadband provider in southern Indiana. Coverage is some or all of 5 rural counties that represent approximately 400 square miles and 58 towers. 90% of our customers are residential or small at home businesses. We have 1450 customers served by primarily Canopy 900Mhz and 2.4Ghz in moderate to rolling hills and lots of trees. 635 customers of our total are served by Canopy 900 with sectors to improve tree/terrain penetration. 2/3 of the 635 are 3-6 miles from the access point. We always try to serve clients by 2.4 and only provide 900Mhz if there is no other way to provide broadband. The 5 Ghz spectrum will not work with our rolling hills and tree cover. Almost all of these 900 clients depend on our company, we are the only provider and if we did not have 900 they would not have any service. The 900Mhz Canopy/Cambium will provide service when it is not possible to even register any other signal from an Access Point. We are pressed to provide service at the present time, due to competition from other groups using the spectrum – GPS farming, Utility meter reading and control, paging systems.

Our company is familiar with the joint test report that WISPA and Progeny prepared and submitted to the FCC. The percentage of throughput reduction reported with the Progeny Network On would dramatically impact our ability to provide any service to a large number of our 900Mhz clients. The 900Mhz spectrum is too congested currently. A 20% or higher throughput reduction would eliminate the ability to provide broadband service to our 900Mhz clients. Over 300 of our 900Mhz clients are on Vertical sectors. In some areas, we have Horizontal and Vertical sectors on the same tanks and towers to improve performance for the customer. The testing was for Progeny to be Vertical and Wireless Broadband to be Horizontal. How are we to absorb the costs for changing polarities for all of those clients and access points?

The results published in the joint test report are very concerning. Our it will introduce an unacceptable level of interference in a very crowded and widely used spectrum. The unlimited an unknown number of Progeny base station transmitters will reduce our ability to provide service to current customers, introduce additional reliability issues/problems, loss of current clients because can no longer provide service. The proposal at best will reduce our channel use, speeds provided and areas that can be served. Less power means less distance from Transmitter to Client. It will impact our company by reducing our revenues and cause additional capital expenditures to reach just our current clients. We will have to review the business plan to see if we can sustain our company after probably losing 1/3rd of our clients. NetsurfUSA was started and still acts primarily as provider of last resort. If we lose the ability to provide 900Mhz as an option and Progeny will cause us to have much more restricted areas we can give service. A large number of rural clients must choose moving or go without broadband. This is a bad idea to give approval to a new network that causes an unacceptable level of interference and harms individuals and companies that depended on the existing frequencies for their broadband. Please do not do this.

Sincerely,
NetsurfUSA, Inc.

A handwritten signature in black ink, appearing to read "Donald L. Renner". The signature is fluid and cursive, with the first name "Donald" and last name "Renner" clearly distinguishable.

Donald L. Renner
Vice President